

ALLTEL CORPORATION

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March 1, 2004

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Office of Managing Director
Federal Communications Commission
445 - 12th Street, S.W. Room TW-B204
Washington, DC 20554

Attn: Wireline Competition Bureau

**Re: ALLTEL Communications, Inc.
Petitions for ETC Status in the States of Alabama, Virginia,
Georgia, North Carolina, and Florida in CC Docket No. 96-45**

Dear Ms. Dortch:

ALLTEL Communications, Inc. ("ALLTEL") hereby supplements its above-captioned petitions seeking eligible telecommunications carrier ("ETC") status in each of the referenced states in order to make the demonstrations required in the recently released order granting ETC status to Virginia Cellular, LLC for both rural and non-rural high cost areas in the Commonwealth of Virginia.¹ ALLTEL has bifurcated its pending ETC petitions into separate requests for ETC designation in non-rural and rural service areas. This supplement is with respect only to its requests for ETC designation in non-rural service areas and is provided to comply with the standards set forth in the Virginia Cellular Order.²

¹ See, *In the Matter of Federal-State Joint Board on Universal Service, Virginia Cellular, LLC Petition for Designation as an Eligible Telecommunications Carrier in the Commonwealth of Virginia*, CC Docket No. 96-45, FCC 03-338 (released January 22, 2004). ("Virginia Cellular Order")

² A supplement to ALLTEL's ETC petitions for its proposed rural service areas will be submitted in the future. ALLTEL is aware that other companies have sought reconsideration of aspects of the Virginia Cellular Order. ALLTEL therefore reserves the right to modify its commitments as appropriate or necessary in response to any changes in law, rules or orders of the Commission.

I. Background.

ALLTEL is seeking designation as an ETC by this Commission, as a wireless service provider with respect to the non-rural wire centers specifically identified in its petitions for each of the five states listed above (the “ETC Service Areas”). These states have expressly indicated that they do not regulate wireless carriers.³ Pursuant to Section 214(e)(6) of the Communications Act of 1934, as amended (the “Act”), ALLTEL filed with the Commission ALLTEL’s petitions for ETC status.⁴ Each of the petitions contains the showings required for ETC status based upon the applicable Commission precedent in force at the time of the filings, pursuant to which the FCC had previously granted numerous petitions of wireless carriers for ETC status.

II. The Virginia Cellular Order.

The Commission, on January 22, 2004, released its Order granting the petition of Virginia Cellular, LLC (“Virginia Cellular”) for ETC status as a wireless carrier in the state of Virginia under Section 214(e)(6) of the Act. The Commission concluded that Virginia Cellular satisfied the eligibility requirements of Section 214(e)(1) by demonstrating that it would offer and advertise the services supported by the universal service support mechanisms throughout its designated service areas. The Commission found that the designation of Virginia Cellular as an ETC in two non-rural areas, and five of the six rural telephone company service areas for which ETC designation had been requested, served the public interest.⁵

The Commission also established the framework for additional public interest showings for ETC designations in *rural* telephone company service areas that will apply to ETC designations for those *rural* areas pending further action by the Commission.⁶ (*Italics added*). This aspect of the Virginia Cellular Order is not relevant to this supplement because, as previously indicated, ALLTEL bifurcated its applications and is supplementing only ALLTEL’s non-rural ETC Service Area applications.

³ See ALLTEL Alabama Petition at pages 2-3; ALLTEL Virginia Petition at pages 2-3; ALLTEL North Carolina Petition at pages 2-4; ALLTEL Georgia Petition at pages 2-3; ALLTEL Florida Petition at pages 3-4.

⁴ The filing dates for each of ALLTEL’s ETC Petitions, as well as the dates of Federal Register Publication of the Public Notice setting the dates for comment on the petitions, are listed below.

Alabama –	Filed: 4/14/2003; 68 FR 36549 (6/18/2003).
Virginia –	Filed: 4/14/2003; 68 FR 36548 (6/18/2003).
Georgia --	Filed: 8/26/2003; 68 FR 75563 (12/31/2003).
North Carolina --	Filed: 8/26/2003; 68 FR 75562 (12/31/2003).
Florida--	Filed: 11/20/2003; (not published).

⁵ The Commission denied Virginia Cellular’s request with regard to the partially served service area of NTELOS due to concerns over “cream skimming” not relevant to ALLTEL’s ETC Petitions for non-rural ETC Service Areas. See Virginia Cellular Order at paras. 35 and 39.

⁶ Virginia Cellular Order at para. 4

The Commission noted that section 214(e)(6) of the Act directs that the Commission “shall” in non-rural areas designate more than one common carrier as an ETC consistent with the public interest, convenience and necessity so long as the carrier meets the requirements of section 214(e)(1)⁷. The Commission acknowledged that it previously found that designation of additional ETCs in areas served by non-rural telephone companies is in the public interest when compliance with the eligibility obligations of Section 214(e)(1) has been demonstrated.⁸ The Commission nonetheless announced a new undelineated standard for grant of ETC status in non-rural areas by noting that it no longer believed that designation of an additional ETC in a non-rural area based merely upon a showing of compliance with Section 214(e)(1) of the Act would necessarily be consistent with the public interest in every instance. The Commission concluded, however, that Virginia Cellular’s public interest showing was sufficient to make the public interest finding for designation in non-rural areas.⁹

III. The ALLTEL Commitments for ETC Status.

The Commission’s Virginia Cellular Order prominently points to Virginia Cellular’s November 12, 2003 supplement as the cited support for the types and levels of commitments required of a wireless carrier to obtain ETC status in both rural and non-rural high cost study areas.¹⁰ In order to satisfy the new requirements and public interest standards set forth in the Virginia Cellular Order, ALLTEL is making the commitments described in this supplement with respect to the ETC Service Areas, in each case subject to receipt of ETC status with respect to those ETC Service Areas. These commitments are consistent with those made by Virginia Cellular.¹¹

⁷ Virginia Cellular Order at para.6.

⁸ Virginia Cellular Order at para. 27, citing to *Cellco Partnership d/b/a Bell Atlantic Mobile Petition for Designation as an Eligible Telecommunications Carrier*, CC Docket No. 96-45, Memorandum Opinion and Order, 16 FCC Rcd 39 (Common Carrier Bureau 2000).

⁹ Virginia Cellular Order at para. 27.

¹⁰ The basic Section 214(e) showings required under prior Commission case law are contained in each of the various ALLTEL ETC Petitions. Those showings do not materially differ in any way from the record showings submitted by Virginia Cellular.

¹¹ ALLTEL acknowledges that the Commission has indicated that the Federal-State Joint Board on Universal Service has an ongoing proceeding considering inter-alia, the process for designating ETC and that the outcome of that proceeding could potentially impact the criteria used for ETC designations. See Virginia Cellular Order at para. 3. ALLTEL notes that any such recommendations will have the force of law only after the Commission issues its order either adopting, modifying or rejecting those recommendations which will be issued after notice and comment procedures are followed. See *Federal-State Joint Board on Universal Service*, 12 FCC Rcd 8776, 9192 (1997) (subsequent history omitted) (“the Commission has the ultimate responsibility to effectuate section 254.... Congress reemphasized the Commission’s authority independent of the Joint Board”); *id* at 9192 n.2077 (“Congress intended the Commission to promulgate regulations to effectuate section 254.”). While the Joint Board has recently issued its recommendations (see *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, FCC 04J-1 (JB

1. CTIA's Consumer Code for Wireless Services.

Virginia Cellular agreed to abide by the CTIA's Consumer Code for Wireless Services.¹² ALLTEL has already committed to abide by the CTIA Consumer Code for Wireless Services, as it may be amended from time to time, for its entire wireless operations across the country, not simply those states in which it seeks ETC status.¹³ Although its commitment to this code goes well beyond a simple inducement to the Commission for the grant of ETC status, ALLTEL further commits that, as an ETC, ALLTEL will abide by the CTIA Consumer Code for Wireless Services with respect to its ETC Service Areas.

2. Consumer Complaint Reporting.

The Commission required Virginia Cellular, as a condition of obtaining and retaining ETC status, to file with the Commission an annual report identifying the number of its customer complaints per 1,000 handsets.¹⁴ If designated as an ETC, ALLTEL will provide the Commission an annual report identifying the number of customer complaints per 1,000 handsets received by ALLTEL with respect to the ETC Service Areas.

Although the incumbent local exchange telephone community attempted to have the Commission enforce more onerous and definitive quality of service standards on wireless ETCs, the FCC once again rejected this request in the Virginia Cellular Order. Accordingly, such arguments made against ALLTEL's ETC petitions should be similarly rejected.

3. Service Provisioning Commitment.

Virginia Cellular specifically described how it would respond to requests for service made by prospective customers.¹⁵ Consistent with the Virginia Cellular Order, ALLTEL makes the following commitment with respect to requests for service within the ETC Service Areas:

In response to requests for service at a residence or business located within the ETC Service Areas, ALLTEL will take the following steps:

1. If a request comes from a customer for service within its ETC Service Areas, ALLTEL will immediately provide service using its standard customer equipment and service offerings where available.
2. If a request comes from a customer residing in any area within the ETC

Feb. 27, 2004)), the standards that must be applied currently to ALLTEL's pending requests are limited to those specified in the Commission's rules and, to the extent not modified on reconsideration or appeal, the Virginia Cellular Order.

¹² Virginia Cellular Order at para. 30.

¹³ Press Release attached hereto as Exhibit A.

¹⁴ Virginia Cellular Order at paras. 30 and 46.

¹⁵ Virginia Cellular Order at para. 15.

Service Areas where ALLTEL does not provide service at the time of the request, ALLTEL will evaluate the feasibility of a number of means to provide service, including the following:

- Whether the customer's wireless handset equipment can be modified or replaced to provide acceptable service;
- Whether a roof-mounted antenna or other network equipment can be deployed at the customer's premises to provide service;
- Whether adjustments at the nearest ALLTEL cell site can be made to provide service;
- Whether there are other available adjustments to network or customer equipment/handsets to provide service;
- Whether an additional cell site, a cell-extender, or repeater can be employed or could be constructed to provide service, and evaluate the costs and benefits of using scarce high-cost support to serve the number of customers requesting service; and
- Whether resold service should be offered to the customer's location in order to provide immediate service.

If, after evaluating the various options described above, ALLTEL determines that it must deny a service request, ALLTEL will notify the customer and provide the Commission with an annual report of how many requests for service were refused following the foregoing evaluation. The Commission will retain authority to resolve any customer complaints that arise from ALLTEL's refusal to respond to a reasonable request for service.

ALLTEL believes these service provisioning commitments, consistent with the Virginia Cellular Order, will ensure that ALLTEL will be responsive to consumers' needs in the ETC Service Areas, while acting as a proper steward of available high-cost support funds.

4. Construction Plans.

Virginia Cellular provided the Commission with its plans for use of high-cost funds.¹⁶ Similarly, ALLTEL will identify its plans for cell site construction and accelerated plans for digital service expansion for the ETC Service Areas. As with Virginia Cellular, these plans must be flexible and are subject to change in response to general consumer demand and other appropriate factors. In connection with its annual certification, ALLTEL will provide the Commission with information on how high-cost support funds were used.

ALLTEL has identified a number of projects in the ETC Service Areas that would be directly funded with high cost support. These construction plans, projected to be

¹⁶ Virginia Cellular Order at para.16.

carried out within one year following certification as an ETC, represent substantially greater levels of financial commitment than ALLTEL expects to receive from the high-cost fund. In addition, ALLTEL will continue to incur maintenance and expense associated with the upgrading of existing plant in the ETC Service Areas that are equally appropriate uses of high cost funds.

Exhibit B sets forth a construction plan and estimated budget amounts for the ETC Service Areas. As previously indicated, the priority under which each cell site is to be constructed is subject to change depending upon requests for service and other market factors.

5. Advertising Commitment.

ALLTEL advertises and informs customers of its services through a variety of means, including newspapers, television, radio and its website. ALLTEL commits to continue to advertise the availability of its services throughout its ETC Service Areas and will also provide notices at local unemployment, social security and welfare offices. Therefore, consumers can learn about ALLTEL's service and determine that Lifeline and Linkup discounts are available. In addition, ALLTEL commits to locally publicize the construction of new facilities so that consumers are informed when new facilities are added to provide improved service in their specific area of interest.

IV. Other Matters.

ALLTEL's service provides the added benefit of a competitively priced telecommunications alternative that includes the feature of mobility as well as a far greater local calling scope than traditional wireline services. ALLTEL commits to provide rate plans that include a substantial local calling area with a corresponding level of included usage that provides a good value for the price of the rate plan.¹⁷

V. Public Interest Showing.

Although the public interest factors delineated in the Virginia Cellular Order, other than the service commitments, apply exclusively to the public interest analysis for rural service areas and not to the non-rural service areas that are the subject of this supplement, ALLTEL nonetheless provides the following additional public interest showing.

The benefits of increased competitive choices afforded consumers by the offerings of wireless ETCs are well known to the Commission and have previously served as the basis for grants of ETC status. These benefits include the additional benefit of mobility and the enhanced utility of a mobile E-911 service offering, as well as the benefits of an alternative technology platform. ALLTEL is well positioned to bring the economies and broader local calling scopes to subscribers in the pending ETC Service Areas. The financial impact of granting ALLTEL's ETC applications for the non-rural service areas as proposed herein on the universal service fund is minimal, as ALLTEL would receive

¹⁷ Virginia Cellular Order at para. 20. ALLTEL's present rate plans are detailed on its website at www.alltel.com.

less than .57% of the total high cost funds if those applications are granted.¹⁸ Finally, as noted herein, ALLTEL has made the commitments described above, which are consistent with those in the Virginia Cellular Order.

VI. Conclusion.

On the basis of the Virginia Cellular Order and the commitments made herein, ALLTEL has met the requirements for ETC status in the proposed or pending ETC Service Areas and met the required public interest threshold for non-rural service territories. Accordingly, ALLTEL should immediately be granted its requests for ETC status in the proposed or pending ETC Service Areas.

Respectfully submitted,

ALLTEL Communications, Inc.

By: /s/ Glenn S. Rabin
Glenn S. Rabin
Vice President
Federal Communications Counsel.

Exhibits attached.

¹⁸ These calculations were based upon ALLTEL's estimate of the amount of support and the size of the current funds. ALLTEL determined the number of subscribers residing in the non-rural areas by comparing the addresses of subscribers to a database of zip codes delineating the areas of its non-rural service area. ALLTEL determined the total per line support of the competing ILECs in each of its ETC Service Areas and multiplied those amounts by the number of ALLTEL customers in the competing ILECs' exchanges to determine its estimated potential support.

Exhibit A

[STORE LOCATOR](#)[ONLINE BILLING](#)[TEXT MESSAGING](#)[CUSTOMER SERVICE](#)[ABOUT US](#)[CAREERS](#)[NEWS](#)[INVESTOR RELATIONS](#)[News Releases](#)[Earnings Releases](#)[Mergers and Acquisitions](#)[All Releases](#)[Information Center](#)[Media Kits](#)[Presentations](#)[Coverage Maps](#)[History/Timeline](#)[Logos](#)[Contacts](#)[Home](#) | [About Us](#) | [News and Information](#) | [2003 News Releases](#)

ALLTEL adopts CTIA wireless consumer code

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Release date: September 9, 2003

LITTLE ROCK, Ark. - ALLTEL today announced it is joining the nation's other wireless carriers in adopting a 10-point consumer code developed by the Cellular Telecommunications & Internet Association.

"Adoption of the consumer code reaffirms ALLTEL's commitment to the basic business principles of treating customers with honesty and respect," said Scott Ford, ALLTEL President and Chief Executive Officer. "Wireless customers have a right to know what they are buying, how much it will cost and where it will work. The code ensures consumers have these answers when making decisions to buy wireless service."

ALLTEL is a customer-focused communications company with more than 12 million customers and nearly \$8 billion in annual revenues. ALLTEL provides wireless, local telephone, long-distance, Internet and high-speed data services to residential and business customers in 26 states.

[Click here to download the factsheet](#) (pdf 172KB)

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ALLTEL adopts Consumer Code

- ALLTEL is adopting the Consumer Code to help make wireless service easier for customers to understand.
- The Consumer Code supports ALLTEL's efforts to get it right or make it right for customers by helping customers make informed choices when shopping for wireless service.
- The code delivers the information and services that empower customers. Our customers have a right to know what they are buying, how much it will cost and where their service will work.
- This cooperative approach was developed by CTIA and the nation's major wireless carriers.



"Adoption of the consumer code reaffirms ALLTEL's commitment to the basic business principles of treating customers with honesty and respect. Wireless customers have a right to know what they are buying, how much it will cost and where it will work. The code ensures consumers have these answers when making decisions to buy wireless service."

— Scott Ford
President and CEO, ALLTEL

CTIA Consumer Code for Wireless Service

1. Disclose rates and terms of service to each new customer.
2. Make available maps at the point of sale and online showing where service is generally available.
3. Confirm contract terms and charges when a customer renews or upgrades service.
4. Allow a 14-day trial period for new service.
5. Provide specific disclosures in advertising regarding material charges and conditions related to advertised prices.
6. Customers' bills will distinguish between monthly charges for service and taxes and other charges remitted to the federal, state or local governments.
7. Provide customers the right to terminate service within 14 days after notice of material changes to their service.
8. Customer service contact information will be provided to customers online and on billing statements.
9. Promptly respond to consumer inquiries and complaints received from government agencies within 30 days.
10. Comply with state and federal customer privacy laws.

Exhibit B

Location	Description	Capital Amount
ALABAMA*		
Pensacola*	Software	\$ 826,000
Mobile	New cell site at Canal Street	\$ 483,000
Mobile	New cell site at Crawford	\$ 483,000
Mobile	New cell site at PEN 020 BLACKSHER	\$ 438,000
Pensacola*	Software	\$ 413,000
Mobile	New cell site at Satsuma South	\$ 404,000
Pensacola*	Switch equipment addition	\$ 346,000
Alabama RSA #4 / #6	New cell site at - Helen New cell site at	\$ 326,000
Southeast Alabama	New cell site at - Anderson New cell site at	\$ 326,000
Mobile	New cell site at - Daniel New cell site at	\$ 301,000
Alabama RSA #4 / #6	New cell site at - Selma DT New cell site at	\$ 300,000
Alabama RSA #4 / #6	New cell site at MGY Highway 6	\$ 263,000
Alabama RSA #4 / #6	New cell site at MGY Highway 84	\$ 263,000
Alabama RSA #4 / #6	New cell site at MGY 169 West Blockton	\$ 263,000
Southeast Alabama	New cell site at MGY Eufaula West	\$ 263,000
Pensacola*	Switch upgrade	\$ 251,000
Pensacola*	Switch equipment addition	\$ 247,000
Mobile	Site equipment addition	\$ 233,000
Southeast Alabama	Site equipment addition	\$ 99,000
Alabama RSA #4 / #6	Carrier addition at North Troy (398)	\$ 43,000
Southeast Alabama	Carrier addition at Troy (353)	\$ 43,000
Pensacola*	Switch equipment addition	\$ 43,000
Pensacola*	Switch equipment addition	\$ 25,000
Mobile	Antenna Modification	\$ 24,000
Mobile	Site work	\$ 21,000
*Pensacola switch projects are required to enable the additional Alabama cell site additions included herein.		
TOTAL		\$ 6,727,000

Florida

PCS - Jacksonville	Software	\$ 844,000
PANAMA CITY	Switch equipment addition	\$ 608,000
PCS - Jacksonville	New cell site at ALLTEL Stadium (RB)	\$ 428,000
PCS - Jacksonville	New cell site at University Med Ctr(RB)	\$ 428,000
PCS - Jacksonville	New cell site at RACETRACK II	\$ 404,000
PANAMA CITY	New cell site at East Tyndall	\$ 296,000
PCS - Jacksonville	Switch upgrade	\$ 295,000
PCS - Jacksonville	New cell site at MIDDLEBURG II (RB)	\$ 288,000
PCS - Jacksonville	Switch equipment addition	\$ 191,000
PCS - Jacksonville	Switch equipment addition	\$ 161,000
PANAMA CITY	Switch control links add	\$ 136,000
PANAMA CITY	Switch power upgrade	\$ 126,000
PCS - Jacksonville	Switch addition	\$ 75,000

PANAMA CITY	Switch equipment addition	\$ 65,000
PCS - Jacksonville	Switch equipment addition	\$ 64,000
PCS - Jacksonville	Switch equipment addition	\$ 62,000
PANAMA CITY	Switch card additions	\$ 56,000
PCS - Jacksonville	New cell site at RB Baymeadow And 9A-ModCel	\$ 52,000
PCS - Jacksonville	New cell site at RB JTB & Hodges-Modcell Se	\$ 38,000
PANAMA CITY	Switch card upgrade	\$ 29,000
PCS - Jacksonville	Switch power upgrade	\$ 28,000
PANAMA CITY	Transport equipment	\$ 17,000
	TOTAL	\$ 4,680,000

Georgia

Albany	Switch upgrade	\$ 2,179,000
Albany	Switch equipment addition	\$ 727,000
Albany	New cell site at-LEESBURG SOUTH F3	\$ 320,000
Albany	New cell site at Philema	\$ 296,000
Albany	New cell site at ALB P1 Coleman	\$ 263,000
Albany	Switch trunk addition	\$ 248,000
Albany	New cell site at ALB COW	\$ 230,000
Albany	Switch equipment addition	\$ 173,000
Albany	New cell site at ALB 54 Walter F George	\$ 162,000
Albany	Switch control links additions	\$ 110,000
Albany	Transport equipment	\$ 72,000
Albany	Carrier addition for F2 & AM EAST ALBANY	\$ 68,000
Albany	Site equipment addition	\$ 62,000
Albany	Transport equipment addition	\$ 47,000
Albany	Carrier addition for-AIRPORT F3	\$ 42,000
Albany	Carrier addition for-ALBANY ADMIN F3	\$ 42,000
Albany	Carrier addition for-ALBANY DT F3	\$ 42,000
Albany	Carrier addition for-ALBANY NORTH F3	\$ 42,000
Albany	Carrier addition for-ALBANY NORTHEAST F3	\$ 42,000
Albany	Carrier addition for-GILLIONVILLE F3	\$ 42,000
Albany	Carrier addition for-MEREDYTH F3	\$ 42,000
Albany	Carrier addition for-WASHINGTON & BROAD F3	\$ 42,000
Albany	Switch card upgrade	\$ 30,000
Albany	Antenna Modification	\$ 24,000
Albany	Switch equipment addition	\$ 20,000
Albany	Transport equipment addition	\$ 17,000
	TOTAL	\$ 5,384,000

North Carolina

WILMINGTON	Site equipment addition	\$ 380,000
GREENSBORO	New cell site at - Country Club	\$ 331,000
GREENSBORO	New cell site at Benbow Road	\$ 331,000
GREENSBORO	New cell site at Carver School	\$ 331,000
GREENSBORO	New cell site at Clemmons Road	\$ 331,000
GREENSBORO	New cell site at Eugene Street	\$ 331,000

GREENSBORO	New cell site at Hampton Road	\$ 331,000
GREENSBORO	New cell site at Jackson Avenue	\$ 331,000
GREENSBORO	New cell site at Reynolds Park	\$ 331,000
GREENSBORO	New cell site at - Caldwell Park	\$ 331,000
GREENSBORO	New cell site at - Downtown Winston	\$ 331,000
Charlotte	New cell site at Delta	\$ 312,000
Charlotte	New cell site at Freedom	\$ 312,000
Charlotte	New cell site at Shamrock	\$ 312,000
Charlotte	New cell site at West Clanton	\$ 312,000
Charlotte	New cell site at Paw Creek	\$ 312,000
Charlotte	New cell site at Rea Road	\$ 312,000
WILMINGTON	New cell site at Middle Sound Loop	\$ 296,000
NC #7B2 - REIDSVILLE	New cell site at South Reidsville	\$ 296,000
NC#12 - BURGAW	New cell site at Topsail Beach	\$ 296,000
WILMINGTON	New cell site at Northwest	\$ 263,000
Charlotte	Antenna Modification	\$ 61,000
NC #11- LUMBERTON	Carrier addition F2 McDonald	\$ 42,000
NC #11- LUMBERTON	Carrier addition F2 Orrum	\$ 42,000
NC #11- LUMBERTON	Carrier addition F2 Pembroke	\$ 42,000
NC #11- LUMBERTON	Carrier addition F2 St. Pauls	\$ 42,000
NC #11- LUMBERTON	Carrier addition F3 Lumberton	\$ 35,000
WILMINGTON	Carrier addition F3 Dutch Square	\$ 35,000
WILMINGTON	Carrier addition F3 Eastwood Road	\$ 35,000
WILMINGTON	Carrier addition F3 Independence	\$ 35,000
WILMINGTON	Carrier addition F3 Park Avenue	\$ 35,000
WILMINGTON	Carrier addition F3 Windemere	\$ 35,000
WILMINGTON	Carrier addition F3 Winter Park	\$ 35,000
WILMINGTON	Carrier addition F3 Wrightsville Beach	\$ 35,000
WILMINGTON	Carrier addition F3 Emerson	\$ 29,000
WILMINGTON	Carrier addition F2 Belville	\$ 27,000
Charlotte	Antenna Modification	\$ 24,000
NC #11- LUMBERTON	Carrier addition F2 Red Springs	\$ 18,000
NC #11- LUMBERTON	Carrier addition F3 Meadow Branch	\$ 18,000
NC #11- LUMBERTON	Carrier addition F3 Pembroke Downtown	\$ 18,000
NC #11- LUMBERTON	Carrier addition F3 South Lumberton	\$ 18,000
TOTAL		\$ 7,374,000

Virginia

RICHMOND	Switch equipment addition	\$ 604,000
RICHMOND	New cell site at Commonwealth Center	\$ 296,000
RICHMOND	New cell site at Hanover Airpark	\$ 296,000
RICHMOND	New cell site at Laurel	\$ 296,000
RICHMOND	New cell site at MCV City Hall	\$ 296,000
VA #1 - WISE CO.	New cell site at BEN HUR	\$ 291,000
VA #1 - WISE CO.	New cell site at DOT	\$ 291,000
VA #1 - WISE CO.	New cell site at DRYDEN	\$ 291,000
VA #1 - WISE CO.	New cell site at PENNINGTON GAP	\$ 291,000
VA #1 - WISE CO.	New cell site at SEMINARY	\$ 291,000
PETERSBURG	New cell site at S. Fort Lee	\$ 283,000

VA #1 - WISE CO.	New cell site at Wise	\$ 234,000
VA #1 - WISE CO.	New cell site at TRI CITIES-ROSEDALE	\$ 170,000
RICHMOND	New cell site at Cary St(dabney Ctr Off	\$ 150,000
VA #1 - WISE CO.	New cell site at TRI CITIES-COEBURN	\$ 100,000
RICHMOND	Switch equipment addition	\$ 86,000
VA #1 - WISE CO.	New cell site at TRI CITIES-ARKANSAS H	\$ 79,000
RICHMOND	Transport equipment addition	\$ 62,000
RICHMOND	New cell site at MONTPELIER	\$ 60,000
VA #1 - WISE CO.	New cell site at TRI CITIES-PARSONAGE	\$ 25,000
RICHMOND	New cell site at Oilville- I-64W Corridor	\$ 20,000
RICHMOND	New cell site at FOXALL	\$ 14,000
	TOTAL	\$ 4,526,000